

<b>IN RE:</b>	)	<b>CHAPTER 13 PROCEEDING</b>
	)	
<b>John C. Shuman</b>	)	<b>CASE NO.: 15-60059</b>
<b>Pamela J. Shuman</b>	)	
	)	<b>JUDGE RUSS KENDIG</b>
<b>DEBTOR(S)</b>	)	
	)	<b>OBJECTION TO CAVALRY SPV I,</b>
	)	<b>LLC PROOF OF CLAIM</b>
	)	<b>(CLAIM #11)</b>
	)	

Now come Debtors, John & Pamela Shuman, by and through their attorney, James R. Galehouse, to respectfully object to the Proof of Claim filed by Cavalry SPV I, LLC (Creditor) on June 26, 2015. Creditor re-filed their proof of claim originally filed on April 8, 2015. The claim filed on June 26, 2015 looks substantively similar to the previously filed claim. Debtors again object to the claim being paid secured – as they no longer have the vehicle. Creditor has asked for a signed statement from the Debtors regarding the whereabouts of the property. Debtors' counsel anticipates having that very soon.

Creditor has claimed \$2,952.43 as a secured claim. The claim appears to stem from the purchase of a Kawasaki Mule. Debtors sold this all-terrain vehicle over a year ago. They no longer have possession of the vehicle. Debtors argue the claim should be paid as unsecured.

Wherefore, Debtors pray that this objection is sustained and that Creditor's Proof of Claim filed on June 26, 2015 (claim #11) be allowed only as an unsecured claim.

Respectfully submitted,

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**Debtors have filed an objection with the court to your claim in this bankruptcy case.**

**Your claim may be reduced, modified, or eliminated.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may want to consult one.)

If you do not want the Court to eliminate or change your proof of claim, or if you want the court to consider your views on the proof of claim, then on or before **August 12, 2015**, or such other time fixed by the Federal Rules of Bankruptcy procedure or statute or as the Court may order, you must:

**File with the Court a written request for a hearing and a written response to the objection, explaining your position, at:**

Clerk of Courts  
United States Bankruptcy Court  
Ralph Regula Federal Building  
401 McKinley Ave. SW  
Canton, OH 44702

If you mail your request and response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

**You must also mail a copy to:**

James R. Galehouse  
Rauser & Associates  
401 W. Tuscarawas St #400  
Canton, OH 44702

Toby Rosen, Trustee  
400 Tuscarawas St., 4<sup>th</sup> Floor  
Canton, OH 44702

**If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to your claim and may enter an Order granting that relief.**

July 13, 2015

/s/ James R. Galehouse  
James R. Galehouse (0084867)

### **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Notice was electronically transmitted on or about July 13, 2015 via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail List:

- Scott D. Fink    ecfndoh@weltman.com
- James R. Galehouse    jgalehouse@ohiolegalclinic.com,  
jamesgalehouse@yahoo.com;nkrenisky@ohiolegalclinic.com;rausermail@ohiolegalclinic.com;jrauser@ohiolegalclinic.com;rauserlaw@gmail.com;rauser@bestclientinc.com;rauserandassociates@gmail.com
- Toby L Rosen    trosen@chapter13canton.com, trosen@ecf.epiqsystems.com
- United States Trustee    (Registered address)@usdoj.gov
- Toby L Rosen trose12    LWEIR@CHAPTER13CANTON.COM

I further certify that the following received notice by regular U.S. Mail at the specified address on the date first set forth above:

**Debtor(s)**

John & Pamela Shuman  
9326 Columbus Rd. NE  
Louisville, OH 44641

**Creditor:**

Cavalry SPV I, LLC  
c/o Bass & Associates, PC  
3936 E. Ft. Lowell Rd. #200  
Tucson, AZ 85712

/s/ James R. Galehouse  
James R. Galehouse (0084867)